

**Federal Defenders
OF NEW YORK, INC.**

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November 2, 2020

By ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

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MEMORANDUM ENDORSED

Re: *United States v. Medghyne Calonge*, 20 Cr. 523 (GHW)

Dear Judge Woods:

I write on consent (Assistant U.S. Attorney Timothy Capozzi) to respectfully request that the Court modify Ms. Calonge's bail conditions by removing the condition requiring one co-signer on the personal recognizance bond executed in this case.

Medghyne Calonge was arrested in the Middle District of Florida on October 9, 2020, and presented in this district on October 19, 2020. Judge Cott set bail conditions including a \$50,000 personal recognizance bond to be co-signed by one person, and supervision as directed by the Pretrial Services Office. At the presentment, I told Judge Cott that we may have difficulty securing a co-signer because Ms. Calonge currently has a strained relationship with the adult members of her family, and lives a largely isolated existence caring for her two children. Judge Cott indicated at the presentment that if the co-signatory condition could not be met by today, counsel could seek a further modification.


I respectfully request that the Court remove the condition of securing a co-signer at this time. Ms. Calonge does not pose a risk of flight. She has lived in Tampa, Florida for decades; has two school-age children; has recently bought a home; has virtually no criminal history; and has been wholly compliant with all the conditions of release. Moreover, as Ms. Calonge well recognizes, the penalties for failing to appear are likely far greater than the penalties Ms. Calonge faces if convicted of the charged offense. As noted above, the Government consents to this request.

Respectfully submitted,

Application granted. The Court removes the condition requiring that Ms. Calonge secure a co-signer. All other conditions of the defendant's pre-trial release remain in full force and effect.

SO ORDERED.

Dated: November 5, 2020
New York, New York


GREGORY H. WOODS
United States District Judge